

**IN THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF NEW YORK**

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MARK I. SOKOLOW, *et al.*,

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Plaintiffs,

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v.

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THE PALESTINE LIBERATION ORGANIZATION, *et al.*,

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Defendants.

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Civil Action No. 04cv397 (GBD) (RLE)

**DECLARATION OF BRIAN A. HILL IN SUPPORT
OF DEFENDANTS' MOTION IN LIMINE TO EXCLUDE THE
TESTIMONY OF PLAINTIFFS' CASE IN CHIEF LIABILITY EXPERTS**

BRIAN A. HILL declares as follows:

1. I am a member of the Bar of the District of Columbia and a member of Miller and Chevalier Chartered, counsel for the *Palestinian Liberation Organization* and *Palestinian Authority* Defendants. I am admitted in the above-captioned matter *pro hac vice*. I submit this declaration in support of Defendants’ Motion in Limine to Exclude the Testimony of Plaintiffs’ Case in Chief Liability Experts (“Motion in Limine”).

2. Attached to the Motion in Limine are true and correct copies of the following materials:

| Exhibit | Description |
|---------|------------------------------------|
| 1 | Expert Report of David Miller |
| 2 | Expert Report of Glenn E. Robinson |
| 3 | Expert Report of Itamar Marcus |

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| 4 | Transcript of Deposition of Itamar Marcus (Nov. 07, 2013) |
| 5 | Rebuttal Report of Itamar Marcus |
| 6 | Print-out from the website of the World Bank: http://databank.worldbank.org/data/views/reports/tableview.aspx |
| 7 | Original and Translation of Exhibit 8 to Marcus Report, which purports to be an article from the newspaper, Al-Ayyam, September 30, 2001 |
| 8 | Original and Translation of Exhibit 21 to Marcus Report, which purports to be an article from the newspaper, Al-Quds, January 19, 2001 |
| 9 | Screenshot of Exhibit 1 to Marcus Report, which purports to be a video clip on PA TV (Fatah), June 29, 2009 |
| 10 | Expert Report of Matthew Levitt |
| 11 | Curriculum Vitae of Matthew Levitt |
| 12 | Transcript of Deposition of Matthew Levitt (Sept. 24-25, 2013) |
| 13 | Expert Report of Jeffrey F. Addicott |
| 14 | Transcript of Deposition of Jeffrey Addicott (Oct. 2, 2013) |
| 15 | Rebuttal Report of Jeffrey Addicott |
| 16 | Expert Report of Efraim Karsh |
| 17 | Curriculum Vitae of Efraim Karsh |
| 18 | List of Publications by Efraim Karsh |
| 19 | Transcript of Deposition of Efraim Karsh (Oct. 15, 2013) |
| 20 | Copy of document referenced in footnote 78 of Karsh Report, which purports to be a transcript of a broadcast on Israel Television, Channel 1, March 23, 1997 |
| 21 | Copy of document referenced in footnote 78 of Karsh Report, which purports to be an article by Peter Hirschberg, "Can Arafat Switch Off Terror?" Jerusalem Report, April 17, 1997 |
| 22 | Copy of document referenced in footnote 88 to Karsh Report, which purports to be an article by Lee Hockstader, "Street Army Spearheads Arab Riots", Washington Post, October 7-9, 2000 |

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| 23 | Transcript of Deposition of Alon Eviatar (Oct. 22, 2013) |
| 24 | Expert Report of Alon Eviatar (Filed Under Seal) |
| 25 | Expert Report of Israel Shrenzel (Filed Under Seal) |
| 26 | May 16, 2013 Letter from Kent. A. Yalowitz to the Hon. Ronald L. Ellis |
| 27 | Expert Report of Ronni Shaked (Filed Under Seal) |
| 28 | Corrected Expert Report of Alon Eviatar (Filed Under Seal) |
| 29 | [Intentionally Left Blank] |
| 30 | Transcript of Deposition of Israel Shrenzel (Oct. 23, 2013) |
| 31 | Copy of document referenced in footnote 254 of Shrenzel Report, which purports to be an Israeli Ministry of Foreign Affairs report |
| 32 | Copy of document referenced in footnote 252 of Shrenzel Report, which purports to be a single page from the book, Tested by Zion, The Bush Administration and the Isareli-Palestinian Conflict, Elliott Abrams, Cambridge University Press, p. 41 |
| 33 | Expert Report of Nick Kaufman |
| 34 | Rebuttal Report of Nick Kaufman |
| 35 | Transcript of Deposition of Nick Kaufman (Oct. 20, 2013) |
| 36 | December 2007 Yesh Din Report |
| 37 | Expert Report of Michael Sfard |
| 38 | Transcript of Deposition of Michael Sfard (Oct. 24, 2013) |
| 39 | March 20, 2013 Letter from Robert J. Tolchin to the Hon. Ronald L. Ellis |
| 40 | May 6, 2013 Letter from Brian A. Hill to the Hon. Ronald L. Ellis |

I declare under penalty of perjury that the foregoing is true and correct.

Dated: May 2, 2014
Washington, D.C.

/s/ Brian A. Hill

Brian A. Hill